

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

-----X	
	:
In re	:
	:
	:
CITY OF DETROIT, MICHIGAN,	:
	:
Debtor.	:
	:
	:
	:
-----	X

Chapter 9
Case No. 13-53846
Hon. Steven W. Rhodes

NOTICE OF VIDEO DEPOSITION
UNDER FED. R. CIV. P. 30 AND FED. R. BANKR. P. 7030

To: The Michigan Council 25 of the American Federation of State, County and Municipal Employees, AFL-CIO, and Sub-Chapter 98, City of Detroit Retirees (the AFSCME retiree chapter for City of Detroit retirees) (collectively, “AFSCME”)

PLEASE TAKE NOTICE THAT, pursuant to Federal Rules of Civil Procedure 26 and 30, made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7030, the City of Detroit (“the City”), by and through its undersigned counsel, will take depositions upon oral examination of the following persons at the time and place set forth, or such other time and place as may be mutually arranged. All such depositions shall be taken at the offices of Miller, Canfield, Paddock, and Stone, PLC, 150 West Jefferson, Suite 2500, Detroit, Michigan 48226:

1. September 23, 2013 @ 9:00 a.m.: Steve Kreisberg

The depositions will be taken before a court reporter or other person authorized by law to administer oaths and provide an official record of the deposition. The oral examination will continue from day to day until completed.

The deposition will be recorded by stenograph and video for the purpose of discovery, for use in the above-titled action, and for any other purpose permitted under the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE THAT because AFSCME, in its response to the City's Interrogatories reserved its right to identify any witnesses who may testify at trial until required by the final pretrial conference instead of in its Interrogatory response, the City reserves its right and intends to depose any such witnesses once identified.

Dated: September 20, 2013

Respectfully submitted,

/s/ Bruce Bennett

Bruce Bennett (CA 105430)
JONES DAY
555 South Flower Street
Fiftieth Floor
Los Angeles, California 90071
Telephone: (213) 243-2382
Facsimile: (213) 243-2539
bbennett@jonesday.com

David G. Heiman (OH 0038271)
Heather Lennox (OH 0059649)
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
dgheiman@jonesday.com
hlennox@jonesday.com

Jonathan S. Green (MI P33140)
Stephen S. LaPlante (MI P48063)
MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.
150 West Jefferson
Suite 2500
Detroit, Michigan 48226
Telephone: (313) 963-6420
Facsimile: (313) 496-7500
green@millercanfield.com
laplante@millercanfield.com

ATTORNEYS FOR THE CITY OF DETROIT

Certificate of Service

I, Bruce Bennett, hereby certify that the foregoing Notice of Video Deposition under Fed. R. Civ. P. 30 and Fed. R. Bankr. P. 7030 was filed and served via the Court's electronic case filing and noticing system on this 20th day of September, 2013.

Dated: September 20, 2013

/s/ Bruce Bennett

Bruce Bennett